

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

<b>IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>
<b>THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBIT ATTACHED HERETO</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**JOINT MOTION TO DISMISS WITH PREJUDICE AND TRANSFER TO MDL 2326**

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants, Johnson & Johnson, Inc., Ethicon, Inc., and/or Ethicon LLC (collectively, the “Ethicon Defendants”), jointly move the court to dismiss with prejudice these actions and all claims against the Ethicon Defendants which were, or could have been asserted, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii). Each party shall bear her or its own costs. The dismissal of these cases relates only to the Ethicon Defendants. Plaintiffs continue to pursue claims against Boston Scientific, and respectfully request the Court transfer this case to MDL 2326.

Respectfully submitted,

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**EXHIBIT A**

<b><u>Case Number</u></b>	<b><u>Last Name</u></b>	<b><u>First Name</u></b>
2:15cv01374	Eychner	Susan E.
2:15cv02637	Naemit	Elena
2:14cv26036	Ryan	Carla Jolene

**CERTIFICATE OF SERVICE**

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage